

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

MATAN GOLDSTEIN,

Plaintiff,

V.

THE RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA, *et al.*,

Defendants.

CIVIL ACTION NO.  
3:24-cv-00036-RSB-JCH

## **UNOPPOSED MOTION TO EXTEND**

COMES NOW Plaintiff Matan Goldstein, by and through undersigned counsel, with the consent of Defendants Faculty for Justice in Palestine UVA Chapter and Students for Justice in Palestine at UVA, through their respective counsel, and, pursuant to Local Rule 11(c)(1), respectfully moves the Honorable Court for an Order (1) extending the time allowed for the Plaintiff to respond to Defendants Faculty for Justice in Palestine UVA Chapter and Students for Justice in Palestine at UVA's pending joint motion to dismiss (Dkt. No. 21) from July 15, 2024, to August 6, 2024, and (2) extending the time allowed for the Plaintiff to amend his Complaint as a matter of course pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) from July 22, 2024, to August 6, 2024.

In support of this motion, the Plaintiff, through undersigned counsel, respectfully states and submits to the Honorable Court that due to the timing of service of process and the attendant varying response deadlines attached to different Defendants, the Plaintiff seeks to harmonize his deadline to respond to the pending motions to dismiss and his deadline to amend the Complaint as a matter of course pursuant to Federal Rule of Civil Procedure 15(a)(1)(B). The Plaintiff hereby

respectfully gives notice of his intent to amend the Complaint and seeks to avoid unnecessary motions practice and expenditure of resources. Undersigned counsel for the Plaintiff has conferred with counsel for Faculty for Justice in Palestine UVA Chapter and Students for Justice in Palestine at UVA who have consented to this motion and approved the language in the proposed Order. Undersigned counsel has also conferred with counsel for Defendants The University of Virginia, Ryan, and Hardie, who have not yet entered an appearance in this matter, and can report that those parties do not object to this motion. Therefore, this motion is unopposed. The Plaintiff further respectfully represents that this complex constitutional and civil rights matter is being diligently prosecuted and defended by all parties and their counsel, that this motion is not interposed for any improper purpose, and finally, that the extensions of time will not cause any delays to trial, discovery, or disposition of this matter.

A proposed Order, attached as Exhibit A, has been signed and approved by Plaintiff's counsel and counsel for Defendants Students for Justice in Palestine at UVA and Faculty for Justice in Palestine UVA Chapter and submitted to the Court.

Date: July 8, 2024

Respectfully submitted,

**MATAN GOLDSTEIN**

By his counsel:

/s/ Gregory W. Brown

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**WE CONSENT:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of July, 2024, I will electronically file a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

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